

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

**DECLARATION OF THE UNITED STATES
CITIZENSHIP AND IMMIGRATION SERVICES**

Pursuant to the parties' stipulation, the United States Citizenship and Immigration Services ("USCIS") provides the following declaration pursuant to 28 U.S.C. § 1746, in lieu of oral testimony regarding topics 3 and 6, as set forth in "Defendants' Second Amended Notice of Intention to Take Oral Deposition of the United States Citizenship and Immigration Services," served on July 15, 2014, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure:

Response to Topic 3

USCIS used the Computer Linked Application Information Management System 4 ("CLAIMS 4") and Central Index System ("CIS") databases, maintained by our agency, to perform the match to the Texas Election Administration Management System (TEAM) database. The CLAIMS 4 system is more particularly described in the publication available on the agency's website at <http://www.dhs.gov/sites/default/files/publications/privacy-pia-update-uscis-claims4-november2013.pdf>, and also in the System of Records notice for the Benefits Information System, DHS-USCIS-007, found at 73 Fed. Reg. 56596 (Sep. 29, 2008) and

available at <http://www.gpo.gov/fdsys/pkg/FR-2008-09-29/pdf/E8-22802.pdf>. The CIS system is more particularly described in the publication available on the agency's website at http://www.dhs.gov/xlibrary/assets/privacy/privacy_pia_uscis_cis.pdf, and also in the System of Records notice for the Alien File, Index, and National File Tracking System, DHS-USCIS-001, found at 78 Fed. Reg. 69864 (Nov. 21, 2013) and available at <http://www.gpo.gov/fdsys/pkg/FR-2013-11-21/pdf/2013-27895.pdf>. These systems are updated as follows:

1. The N400, "Application for Naturalization," N600, "Application for Certificate of Citizenship," or N600K, "Application for Citizenship and Issuance of Certificate Under Section 322" are submitted in paper form by the applicant and receipted by USCIS. Data is harvested from the application (referred to as the "persistence process"), either with semi-automated mechanisms, or manually (keyboard entry), and stored in the CLAIMS 4 system. During this persistence process, selected data is evaluated for conformity to reference data, and where errors exist, is evaluated to determine whether the requisite elements have been supplied. Applications containing missing or incomplete data elements could result in a system rejection, others are flagged for corrective action later in the process.

2. After receipting, the case file proceeds to the National Benefits Center or is retained in the Nebraska Service Center for pre-interview processing. Inclusive in this processing phase are correction of data errors previously identified, scheduling of the applicant for appearance at an Application Support Center for biometric collection, retrieval of the Alien file, evaluation of data elements in the Central Index System for mismatch, and commencement of the FBI Name Check. The case management system within CLAIMS 4 manages all of these processes, and logs each process when it starts and completes. Data updates to the system are controlled by application software utilized either by an interface program or an end user. Results

of all the background checks are recorded in the system via interface programs. Adhoc processes, such as an address change, are conducted by end users on demand.

3. Upon completion of pre-interview processing and file setup, the case is designated as "interview ready" and goes into the scheduling queue. The case is then scheduled for an interview appearance at a USCIS Field Office. When this scheduling action is completed, a final quality control check is accomplished at the pre-processing center, and the case is transferred to the Field Office.

4. The applicant then may appear for an interview conducted by an Immigration Services Officer (ISO). Appropriate data changes are accomplished by the ISO using application software during the interview process and are saved in the CLAIMS 4 system. A decision is made by the ISO based on business rules in accordance with the Immigration and Nationality Act (INA), and recorded in the CLAIMS 4 system. The case then undergoes a supervisory review and approval to ensure INA and agency policy compliance. If the case is approved, a reverification process occurs to ensure the application was adjudicated in accordance with the Naturalization Quality Procedures, and that reverification is recorded in the CLAIMS 4 system. If the case is not approved the ISO may elect to request additional information from the applicant.

5. An applicant approved for Naturalization will then proceed to the oath ceremony phase, if required. All applicants over 14 are required to participate in an Oath Ceremony. The appropriate certificate is prepared in the system, and typically includes the printing of biometric images (digital photo, digital signature) on the certificate. The applicant appears for the Oath Ceremony, is administered the Oath of Allegiance, and the certificate is presented. At this juncture, the applicant becomes a U.S. Citizen.

6. The oath ceremony appointment is closed out in the system, indicating the applicant did appear for the ceremony, and properly took the oath. The system workflow advances the case to the closeout phase where an interface occurs between CLAIMS 4 and the Central Index System. Upon successful completion of this interface, pertinent data from CLAIMS 4 is applied to Central Index System, and the case is closed from the active workflow. All case data is retained within CLAIMS 4, and is available for review, audit, and reporting.

7. Security compliance updates, and system software and hardware updates, are performed regularly and as needed according to agency and Government-wide laws, rules, regulations and policy guidance. CLAIMS 4 is backed up daily to magnetic backup tape and taken to a secure location on a weekly basis. The USCIS Information Security Division performs regular and periodic audits of CLAIMS 4 system security in accordance with agency and Government-wide protocols. The data in CLAIMS 4 is retained in accordance with an approved National Archives and Record Administration (NARA) retention schedule, which is publicly available.

Response to Topic 6

A comprehensive and detailed description of the requirements, standards, and protocols for obtaining a Naturalization Certificate or a Certificate of Citizenship issued by U.S. Citizenship and Immigration Services can be found at the following locations on the United States Citizenship and Immigration Services public internet website:

1. The USCIS Policy Manual at Volume 12, Part K:

<http://www.uscis.gov/policymanual/HTML/PolicyManual-Volume12-PartK-Chapter1.html>, and following chapters.

2. Form N-600 Certificate of Citizenship and the Form N-600 Instructions:

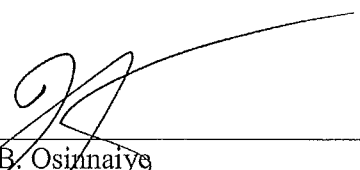
<http://www.uscis.gov/n-600>

3. Form N-400 Application for Naturalization and the Form N-400 instructions:

<http://www.uscis.gov/n-400>

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

This 21st day of July, 2014.



Yemi B. Osinnaiye
Acting Associate Chief of Systems Operations
Office of Information Technology
United States Citizenship and
Immigration Services